

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER  
LTD.

Index No.

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE  
LIBRARY GENESIS PROJECT d/b/a  
LIBGEN.ORG, ALEXANDRA ELBAKYAN,  
JOHN DOES 1-99,

Defendants.

**DECLARATION OF ROBERT LENDENSKY**

I, Robert Lendensky, declare as follows is true and correct:

1. I am a Director of Business Development with TransPerfect. My office address is 3 Park Avenue, 39<sup>th</sup> Floor, New York, NY 10016.

2. I have reviewed the Declaration of David M. Hirschberg in the above-titled action (the "Hirschberg Declaration") and Exhibits A through F thereto.

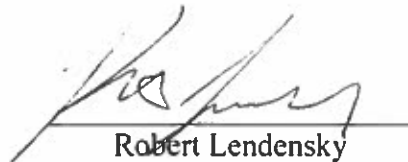
3. I hereby affirm that TransPerfect Legal Solutions employees captured each of the Russian-language website screenshots and Twitter postings either on or about April 1, 2015, or, in the case of the VK.com postings of May 31, 2015, and June 2, 2015, on or about June 10, 2015, and that Exhibits A through F to the Hirschberg Declaration contain true and correct

copies of the website screenshots and Twitter postings as they appeared on the day they were captured.

4. I hereby affirm that linguists contracted by TransPerfect Legal Solutions translated the text of the website screenshots and Twitter postings referenced above and that, to the best of my knowledge and belief, the translations provided in Exhibits A through F to the Hirschberg Declaration are true and correct translations from Russian to English of those website screenshots and Twitter postings.

I declare under penalty of perjury that the foregoing is true and correct.

Dated June 10, 2015.



Robert Lendensky